

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America
v.
TRICIA MOON a/k/a William Leinhauser

Case No. 20-mj-1753

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2020 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. 2113(a)

Offense Description

Attempted Bank Robbery

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

/s James Finnegan

Complainant's signature

James Finnegan, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/27/2020

/s Richard Lloret

*Judge's signature*City and state: Philadelphia, Pennsylvania

Richard A. Lloret, U.S.M.J.

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, James F Finnegan, being duly sworn under oath and deposed, state the following:

1. I have been employed by the Federal Bureau of Investigation for the last 14 years as a Special Agent. I am presently assigned to the Violent Crimes Task Force (VCTF) that investigates violations of state and federal laws, to include commercial robberies, bank robberies, kidnappings, Fugitives, and major theft investigations of pharmaceutical drugs, among other violations of the law. The statements in this affidavit are based on police reports, the recovery of physical evidence from the crime scene, and information provided to me by law enforcement personnel and others. These statements are true and correct to the best of my knowledge, information, and belief.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging TRICIA MOON (also known as William Leinhauser)¹, date of birth 03/05/1974, with violating one count of 18 U.S.C. § 2113(a) (attempted bank robbery).

3. On Thursday, September 24, 2020, at approximately 2:15 p.m., an unknown white person (the “Subject”) attempted to rob the Bank of America located at 2118 Cottman Avenue, in Philadelphia, Pennsylvania, by presenting a demand note to the victim teller. The Subject entered the bank, approached the victim teller, and placed a piece of paper under the glass. The piece of paper had a note on it that stated:

This is a robbery. No dye packs, no tracers! Place all the 100s 50s 20s and 10s in the envelope free of bands. Place this note in envelope pass to me Act natural 45 secs to comply” (sic).

4. The victim teller hesitated and asked the Subject how she could help. The Subject replied, “Give it to me now, or I will shoot you, count to 10, if not I’ll shoot you.” The Subject made that statement while putting her hands down near her waistband. The victim teller was frightened and thought about giving the Subject the money, but instead the victim teller grabbed her cash drawer keys and ran to the back of the bank refusing to give the Subject robber the money. Consequently, the subject received no U.S. Currency.

¹ The government’s understanding is that up until recently, Moon’s legal name was William Leinhauser, and she presented to others as a male. Moon’s legal name is now Tricia Moon, and she uses the pronouns she, her, hers. I refer to Moon’s previous name and formerly associated gender only for clarity given her previous involvement in bank robberies as William Leinhauser.

5. The Subject left the bank and fled on foot in an unknown direction. The Subject was described as a white male, 5'5"-5'7" in height, wearing a medical mask, red hat under a black hooded sweatshirt, and white latex gloves. The Subject had a tattoo on his neck.
6. After the robbery, Philadelphia Police Department (PPD) Officers responded to the area. PPD conducted interviews, recovered the demand note and manila envelope left by the Subject, and collected surveillance video and photos. FBI VCTF issued a Wanted Flyer using the same surveillance photos.
7. On September 25, 2020, Senior Federal Probation Officer Carla Benjamin notified Special Agent Finnegan that she knew the Subject, depicted in the Wanted Flyer for the robbery of Bank of America on September 24, 2020, as Tricia Moon, also known as William Leinhauser.
8. Benjamin has been supervising Moon since her release from federal prison on July 17, 2020. Moon was convicted and sentenced in federal court for two separate bank robberies. Most recently, in Criminal No. 13-121, the Honorable Harvey Bartle, III sentenced Moon (as William Leinhauser) to 84 months incarceration and 3 years' supervised release for a May 2014 robbery of a PNC Bank in Philadelphia. On November 19, 2007, in Criminal No. 06-631, the Honorable Paul S. Diamond sentenced Moon (as William Leinhauser) to 77 months' imprisonment and 3 years' supervised release for robbing the same Commerce Bank in Philadelphia on two different occasions.
9. The following are two photos used by Officer Benjamin to identify Moon as the person that attempted to rob the Bank of America on September 24, 2020. The photo on the left is a still photo from security surveillance footage from the September 24, 2020 bank robbery of Bank of America. The photo on the right is a known photo of Moon.



10. On October 8, 2020, a forensic scientist with the Philadelphia Department of Forensic Science issued a report comparing Moon's known fingerprints (in the database and referred to in the report as William Leinhauser) to impressions on the demand note and a manila envelope held by the Subject who attempted the September 24, 2020 bank robbery of Bank of America. The impressions on the manila envelope were individualized to Moon's right ring finger and right little finger, respectively.

11. The deposits of the Bank of America located at 2118 Cottman Avenue in Philadelphia, Pennsylvania, are insured by the Federal Deposit Insurance Corporation (FDIC) and were insured by the FDIC at the time of the bank robbery described above.

12. Based on the foregoing, I submit there is probable cause to charge Tricia Moon with the September 24, 2020 attempted robbery of the Bank of America, 2118 Cottman Avenue, in Philadelphia, Pennsylvania.

Respectfully Submitted,

/s James Finnegan

JAMES F FINNEGAN
Special Agent
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN TO BEFORE ME
THIS 27th Day of October, 2020

/s Richard Lloret

HONORABLE RICHARD A. LLORET
United States Magistrate Judge
Eastern District of Pennsylvania